UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

August 30, 1996

Reply to
Attn of: ECL-113

Nolan Jensen, Acting Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: EPA Comments on Draft Scope of Work for Operable Unit 4-13 Comprehensive Remedial Investigation/Feasibility Study

Dear Mr. Jensen:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced Scope of Work (SOW) and is submitting the attached comments.

EPA understands that the draft-final SOW will be submitted on or about October 1, 1996. If you have any questions about these comments, please call me at (206) 553-6903.

Sincerely,

Howard Orlean

Howard Orlean
WAG-4 Manager

cc: M. Shawn Rosenberger, DEQ-Idaho Falls
Alan Dudziak, DOE-ID
Dave Hovland, DEQ-Boise
Wayne Pierre, ECL-113

EPA Comments on Draft OU 4-13 SOW
August 30, 1996

1. Pages 5 through 7, Table 1 --

Please revise this table to reflect the current up-to-date status of each site. For clarification, the following recommendations were made by EPA which were not reflected in the table:

OU	SITE ID	EPA RECOMMENDATION
4-03	CFA-22	No Further Action pending additional explanation of sampling methodology
4-05	CFA-04	Further evaluation in comprehensive RI/FS
	CFA-17	No Further Action
	CFA-47	Evaluate for possible removal action
4-09	CFA-46	No Further Action

2. Page 12, Section 4.3, Item Number 5 --

Please note that in April, 1996 EPA issued a Soil Screening Guidance-User's Guide and Technical Background Document (TBD). The Generic Soil Screening Levels (Generic SSLs) listed in Appendix A of the TBD are very conservative and are generally designed to be used where a future residential use scenario is appropriate. However, these Generic SSLs may still be useful as a tool for initial screening.

3. Page 13, Bottom of Page --

Prior to evaluating the list of appropriate technologies via the nine criteria, if necessary, a screening of potential technologies and process options for technical implementability should occur.

4. Page 15, Section 6.1, First Paragraph --

The OU 4-13 human health risk assessment approach should also be based on EPA Region 10's *Supplemental Risk Assessment Guidance for Superfund Risk Assessments* (August, 1991).

5. Page 17, Top of Page, Section 6.1.2.1 --

Please define what the "mini-SLERA" will entail. (Or use another term which might be more technically accurate.)

6. Page 23, Section 6.1.2.3.1, First Bullet --

What is the rationale for using the 30-year average concentration only between 100 and 130 years in the future?

7. Page 26, Section 6.1.2.5, Last Paragraph --

Please explain the rationale for using the approach described here with respect to calculating the homegrown crops exposure pathway. It would seem that summing the COPC UCL concentration with the soil concentration resulting from the equilibrium partitioning between the soil and contaminated ground water would not result in a statistically significant increase in exposure, even assuming that the ground water was contaminated in the first place.

8. Page 29, Section 6.1.3, Second Paragraph, Last Sentence --

This sentence which describes the quantitative structure-activity approach does not appear to make sense. What is being compared? Is it the compound that has an EPA-approved toxicity value with the compound that does not have an EPA-approved toxicity value but has a similar structure and activity?

9. Page 32, Section 6.2 --

It would be appropriate in this section to define what a "mini-SCLERA" entails (see comment # 5).

10. Pages 36 & 37, Sections 7. & 8. --

EPA issued a draft revised Directive re: *Guidance on Preparing Superfund Decision Documents* in 1992. Even though this Directive was only issued in draft format it still contains additional up-to-date guidance which should be applied to the writing of the Proposed Plan and Record of Decision.

11. Page A-3, "Initial Evaluation" --

Please include a section on Preliminary Remediation Goals (PRGs) in the RI/FS Work Plan.